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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN JOSE**

18 VLSI TECHNOLOGY, LLC,
19
20 Plaintiff,
21 v.
22 INTEL CORPORATION,
23 Defendant.

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Case No. 5:17-cv-05671-BLF

**DECLARATION OF MARK D. SELWYN
IN SUPPORT OF INTEL
CORPORATION'S ADMINISTRATIVE
MOTION FOR RELIEF FROM
PROTECTIVE ORDER**

I, Mark D. Selwyn, do hereby declare as follows:

1. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Intel Corporation (“Intel”) in the above-captioned case. I am licensed to practice law in the State of California, the Commonwealth of Massachusetts, and the State of New York, and am admitted to practice before the U.S. District Court for the Northern District of California. I am familiar with the facts set forth herein, and, if called as a witness, I could and would testify competently to those facts under oath. I submit this declaration in support of Intel’s Motion to For Relief From Protective Order, pursuant to Civ. L.R. 7-11.

2. On January 14, 2021, counsel for Intel requested VLSI Technology LLC’s (“VLSI”) consent to the relief sought by this motion. On January 15, counsel for VLSI responded requesting that Intel identify with particularity the documents for which Intel sought the requested relief. On January 18, counsel for Intel responded by listing the same documents identified in this motion and again requesting VLSI’s position. Counsel for VLSI responded that same day indicating it was available for a meet and confer on January 22. Counsel for Intel responded on January 19 reiterating its request for a meet and confer on January 19 or 20. On January 20, counsel for VLSI responded reiterating its availability on January 22. On January 21, counsel for Intel responded reiterating its availability for January 21 but accepting a meet and confer on January 22 if counsel for VLSI remained unavailable on January 21.

3. The parties met and conferred on January 22 but were unable to reach agreement.

Dated: January 22, 2021

By: /s/ Mark D. Selwyn

Mark D. Selwyn

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